

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Percy Lewis

Case: 2:25-mj-30098

Case No. Assigned To : Unassigned

Assign. Date : 2/28/2025

Description: CMP USA V. LEWIS (DJ)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 17, 2025 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 2252A(a)(2)

Receipt of child pornography

18 U.S.C. § 2252A(a)(5)(B)

Possession of child pornography

This criminal complaint is based on these facts:
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: February 28, 2025City and state: Detroit, Michigan

*Complainant's signature*Michael Hendricks, Special Agent (HSI)*Printed name and title*

*Judge's signature*Hon. Kimberly G. Altman, United States Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Michael Hendricks, being first duly sworn, state as follows:

1. I am a Special Agent with Homeland Security Investigations (HSI), of the United States Department of Homeland Security (DHS). I have been employed as a Special Agent for HSI since January 2020. I successfully completed the criminal Investigator Training Program (CITP) (2015) and the HSI Special Agent training (HSISAT) (2021) at the Federal Law enforcement training center (FLETC) in Glynco, GA. Prior to joining HSI, I completed the U.S. Secret Service Special Agent Training (SABT) in Beltsville, MD (2015). I also completed the Health and Human Services Office of Inspector General (HHS-OIG) Special Agent Training Program (SABT) in Largo, MD (2016). I received a bachelor's degree in public safety studies from Sienna Heights University and a master's degree in public administration from the University of Michigan. Additionally, I am a Computer Forensic Agent (CFA). I have successfully completed the Basic Computer Evidence Recovery Training (BCERT) and Basic Mobile Device Forensic Training (BMDF) at the IRS-CI Digital forensics lab in Woodbridge, VA. While employed at HSI, I have investigated Federal criminal violations related to cybercrime, child exploitation, and child pornography. I have received training on child pornography and child exploitation and have had the opportunity to observe

and review numerous examples of child pornography (as defined in U.S.C. 18 § 2256) in all forms of media.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for Percy LEWIS for violations of 18 U.S.C. §§ 2252A(a)(2) (receipt of child pornography) and 2252A(a)(5)(B) (possession of child pornography).

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information made available to me by other law enforcement professionals. These facts are provided for the sole purpose of establishing probable cause for the issuance of a criminal complaint and arrest warrant; therefore, this affidavit does not necessarily contain all information uncovered during this investigation. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for an arrest warrant for Percy LEWIS.

4. Earlier in February 2025, a local police department in the Eastern District of Michigan came into the possession of LEWIS's cell phone from a concerned party. The cell phone was abandoned by LEWIS and turned over to the concerned party. The concerned party signed a consent to search the device. Based on that department's initial review of LEWIS's cell phone, his device contained

child pornography as well as several electronic communications with other people discussing child pornography, and sexually abusing children.

5. For example, LEWIS communicated with SUSPECT-1, an individual known to law enforcement, from approximately July 2023 to November 2024. On one occasion, LEWIS asked SUSPECT-1 whether SUSPECT-1 could bring a minor to meet with LEWIS. In response, SUSPECT-1 asked for a ride and stated that he wanted the minor to be “slammed.” On another occasion, SUSPECT-1 stated that he was next to a minor who was “looking juicy,” and LEWIS responded, “ur torturing me”. SUSPECT-1 also stated to LEWIS, “Find a way to put him to sleep and then no limits.” LEWIS stated that he had “g”, and SUSPECT-1 asked, “how much should knock him out?” Based on law enforcement training and information, “g” is one of the terms used to refer to GHB, a depressant drug with sedative and euphoric effects.

6. Law enforcement searched for the telephone numbers associated with these electronic communications in databases available to law enforcement, and the results showed that the telephone numbers were associated with SUSPECT-1 and LEWIS.

7. In an initial preview of LEWIS’s device, HSI Computer Forensic Agents observed multiple videos and images that meet the Federal definition of child pornography, including the following:

- a. An image labeled ‘telegram-cloud-document-1-4972[redacted]. The

image depicts an apparent male minor child, nude on his hands and knees. There is a nude adult male behind the victim who appears to have his penis inside the victim's buttocks, and another nude male in front of the victim who appears to have his penis in the victim's mouth. Using the image's "hash value," which is a specific string of numbers and letters that identify a unique piece of data, akin to a digital fingerprint, law enforcement searched a database of known and previously identified child pornography. Based on the hash value, this video matched identified child pornography, indicating that the image had previously been transported over the internet. The file path shows this video was found in the Telegram data folder, indicating that it was downloaded from the internet-based messaging application Telegram.

b. A video labeled "telegram-cloud-document-1-5114[redacted]." This video depicts a pre-pubescent female, nude from the waist down. For the duration of the video, an adult male repeatedly inserts his penis into the victim's anus. The file path shows this video was found in the Telegram data folder, indicating that it was downloaded from the internet-based messaging application Telegram.

c. A video labeled "telegram-cloud-document-1-5098[redacted]." This video is approximately nineteen seconds in length. This video depicts a nude pre-pubescent female, sitting on the floor with her genitals exposed to the camera. The female victim is rocking back and forth on the carpet, she has

her hands on her buttocks spreading her genital area. The file path shows this video was found in the Telegram data folder, indicating that it was also downloaded from Telegram.

8. Based on the information above, there is probable cause to believe that Percy LEWIS violated 18 U.S.C. §§ 2252A(a)(2) (receipt of child pornography) and 2252A(a)(5)(B) (possession of child pornography).

9. Wherefore by this affidavit and application, Affiant requests that the Court authorize the issuance of a criminal complaint and arrest warrant for Percy LEWIS.

Respectfully submitted,



Michael Hendricks, Special Agent
Department of Homeland Security
Homeland Security Investigations

Sworn to before me in my presence
and/or by reliable electronic means.



Hon. Kimberly G. Altman
United States Magistrate Judge

February 28, 2025